

REMARKS/ARGUMENTS

Restriction Requirement

In response to the Restriction Requirement mailed March 22, 2007, Applicants provisionally elected to prosecute claims 18-27 (Group II) with traverse. It is noted that both Group I and Group II are in the same classification. The Office Action incorrectly states these are in different classifications. See Page 3, second paragraph. Further, a prima facie case combination-subcombination restriction requires a showing of two way distinctness. That has not been adequately set forth in this rejection. The Office Action states the purpose of Group I claims is "risk management" optimization and that Group II is directed to "meta data mapping," which leaves Applicants perplexed. Apparently this is a cut-and-past clerical error.

In any event, Applicants cannot withdraw Group I until a proper prima facie case can be set forth for doing so. At least because of the apparent clerical errors, certainly the Office has not met its burden. The traversal of this rejection is reiterated for reconsideration.

Amendments

The claims are modified in the amendment. More specifically, claims 18-20 and 22-25 have been amended, and new claims 32-39 have been added. Therefore, claims 18-27 and 32-39 are present for examination. The withdrawal of Group I claims is traversed above. Applicant reserves the right to pursue any un-amended, canceled or withdrawn claims in a continuing application without any prejudicial effect. No new matter is added by these amendments, which are fully supported by the specification. Applicant respectfully requests reconsideration of this application as amended.

35 U.S.C. §112 Rejection, Second Paragraph

Claims 24, 18-27 and 21 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter. These claims are amended. No new matter is added by this amendment.

35 U.S.C. §102 Rejection, Wilf et al.

The Office Action has rejected claims 18-27 under 35 U.S.C. §102(b) as being anticipated by cited portions of U.S. Patent No. 5,884,288 to Chang et al. (hereinafter "Chang"). For a valid anticipation rejection, the Office must show that each and every limitation from the claims appears in a single piece of prior art. Applicants believe major limitations from claims 18-27 and 32-29, as amended, are neither taught nor suggested in Chang.

Chang is directed to bill payment with a traditional check model in contrast to the stored value system of the present claims. Specific to the claims, Chang cannot be relied on to teach or suggest online selection of handlers by the sender and the plurality of receivers. This allows each party to specify what type of handler is used for the in- or out-transfer, which makes sense for stored value account applications. For example, the sender can fund the aggregate amount from promotional handler using airline miles and each recipient can also choose from the handlers to receive payment. In contrast, Chang is limited because it does not contemplate either stored value or variability between these in- and out-transfer handler types or their selectability. Chang is simply banking, which can be used by the claimed invention as one possible type of handler, but is not so limited. Applicants respectfully request that the anticipation rejection be withdrawn for at least this reason.

The new claims and dependent claims further accentuate these differences. The Office is requested to contact the undersigned for an explanation of stored value systems referenced in the claims as there is ample cites to Chang (e.g., Office Action, page 7, first two paragraphs) for teaching this topology. Frankly, appreciating the differences between Chang and the claimed invention is difficult without understanding the difference between stored value and traditional bank accounts.

Reconsideration of the rejection is respectfully requested.

Interview Request

Should further action be required before allowance of this application, Applicant hereby requests an interview. The subject matter of this application is complex and discussing

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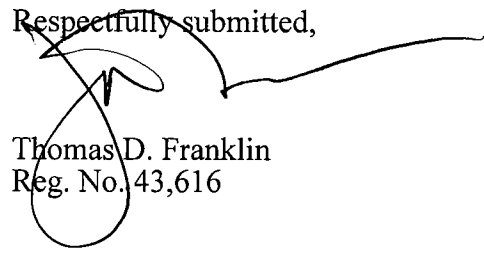
PATENT

Amdt. dated June 22, 2007

Reply to Office Action of Cheryl L. Neofytides et al.

the issues before further action would be helpful in any further prosecution. The undersigned can be reached by telephone at 303-571-4000.

Respectfully submitted,



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